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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Master File No. CV-07-5944 SC  
MDL No. 1917

This Document Relates To:  
  
ALL INDIRECT PURCHASER ACTIONS

**SECOND DECLARATION OF  
LAUREN C. CAPURRO IN SUPPORT  
OF INDIRECT PURCHASER  
PLAINTIFFS' MOTION TO COMPEL  
JURISDICTIONAL DISCOVERY  
FROM THE IRICO DEFENDANTS**

1 I, Lauren C. Capurro, declare:

2 1. I am a partner in the firm Trump, Alioto, Trump & Prescott, LLP, Lead Counsel  
3 for the Indirect Purchaser Plaintiffs (“IPPs”) in the above-captioned action. I am a member of the  
4 Bar of the State of California and admitted to practice before this Court. I make this Second  
5 Declaration in further support of IPPs’ Motion to Compel Jurisdictional Discovery from the Irico  
6 Defendants. Except where otherwise stated, the matters set forth herein are within my personal  
7 knowledge and if called upon and sworn as a witness I could competently testify regarding them.

8 2. I am informed and believe that during an August 3, 2018 meet-and-confer call  
9 jointly conducted by the Direct Purchaser Plaintiffs (“DPPs”) and IPPs with Irico regarding  
10 Irico’s discovery responses, DPP counsel asked if there are any legal impediments under Chinese  
11 law to copying the archived accounting and sales records that Irico Defendants make available for  
12 inspection in China. Irico’s counsel Stuart Plunkett responded that he did not know if there are  
13 any restrictions on copying the archived documents. DPP counsel requested that Irico’s counsel  
14 confer with his client and determine if there would be any restriction. Irico’s counsel has not  
15 responded to this request

16 3. Irico’s descriptions of its archived records and the corporate governance  
17 documents it has produced to date indicate that Irico has limited its searches to centralized files.  
18 Communications with customers and other CRT manufacturers are more likely reside in  
19 individual custodial files, such as those belonging to Mengquan Guo, Zhaojie Wang—two of the  
20 witnesses whose depositions Plaintiffs have noticed. IPPs’ review of Irico’s document production  
21 to date indicates that Irico has not produced *any* documents from these witnesses’ files.

22 I declare under the penalty of perjury under the laws of the United States of America that  
23 the foregoing is true and correct.

24 Executed this 19th day of September, 2018 in San Francisco, California.

25  
26 /s/ Lauren Capurro

27 Lauren Capurro